

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION**

<b>IN RE:</b>	<b>: CASE NO: 16-10845-SDM</b>
	<b>: CHAPTER: 13</b>
	<b>:</b>
<b>JOE SIMON WELLS</b>	<b>:</b>
<b>SHARON WELLS,</b>	<b>:</b>
	<b>:</b>
<b>Debtors.</b>	<b>:</b>
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<b>TERRE M. VARDAMAN,</b>	<b>:</b>
	<b>:</b>
<b>Movant,</b>	<b>: CONTESTED MATTER</b>
	<b>:</b>
<b>vs.</b>	<b>:</b>
	<b>:</b>
<b>U.S. BANK TRUST NATIONAL</b>	<b>:</b>
<b>ASSOCIATION AS TRUSTEE OF TIKI</b>	<b>:</b>
<b>SERIES III TRUST C/O SN SERVICING</b>	<b>:</b>
<b>CORP,</b>	<b>:</b>
	<b>:</b>
<b>Respondent.</b>	<b>:</b>

**RESPONSE TO TRUSTEE'S MOTION FOR ACCOUNTING**

COMES NOW U.S. Bank Trust National Association as Trustee of Tiki Series III Trust C/O SN Servicing Corp, for itself, its successors and/or assigns ("Respondent"), and shows this Honorable Court the following regarding the Trustee's Motion for Accounting ("Motion"):

1.

Respondent asserts that it holds a valid mortgage on Debtors' Property located at 614 Cypress Street, Columbus, MS 39702. A previous servicer filed a Proof of Claim listing the total loan balance due of \$47,858.72 and pre-petition arrearages totaling \$4,218.24 as the loan was set to mature during the life of the Bankruptcy case on December 1, 2016 (see claim #5). Subsequent to the filing of the Proof of Claim, the servicing of the Debtors' mortgage account serviced transferred and Respondent became the current mortgage servicer as evidenced by the Transfer of Claim filed on September 20, 2018 at document #51.

2.

The Trustee filed a Motion for Accounting on May 15, 2019 (Dkt. #54) requesting a current accounting of the claim due to the service transfers as well as assertions by the Debtor that there had been a loan modification with a previous servicer.

3.

Respondent respectfully requests additional time to provide the Trustee with all the necessary information requested in the Motion.

WHEREFORE, Respondent, for itself, its successors and/or assigns, prays that this Court inquire as to the matters raised herein and enter such orders and require such further inquiry as may appear appropriate to the Court.

Date: 6/6/2019

/s/ Natalie Brown  
Natalie Brown  
MS State Bar No. 100802  
Rubin Lublin, LLC  
428 North Lamar Blvd, Suite 107  
Oxford, MS 38655  
(877) 813-0992  
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Attorney for Respondent

CERTIFICATE OF SERVICE

I, Natalie Brown of Rubin Lublin, LLC certify that on the 6th day of June, 2019, I caused a copy of the Response to Trustee's Motion for Accounting to be filed in this proceeding by electronic means and to be served by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to the said parties as follows:

Joe Simon Wells  
614 Cypress Street  
Columbus, MS 39702

Sharon Wells  
614 Cypress Street  
Columbus, MS 39702

William C. Cunningham, Esq.  
P.O. Box 624  
Columbus, MS 39703

Terre M. Vardaman  
P.O. Box 1326  
Brandon, MS 39043

U.S. Trustee  
501 East Court Street  
Suite 6-430  
Jackson, MS 39201

Executed on 6/6/19

By: /s/ Natalie Brown  
Natalie Brown  
MS State Bar No. 100802  
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